



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

9/20/2012

Kris Buck
Hobart Brothers Company I
101 TRADE SQUARE EAST
TROY, OH 45373

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0855140007
Permit Number: P0110493
Permit Type: Initial Installation
County: Miami

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Troy Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
RAPCA; Indiana



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Hobart Brothers (Facility ID 08551404007) is located in Troy (Miami County) Ohio. Hobart Brothers currently operates 19 welding wire draw benches with fabric filters as four emissions units (P030, P031, P032 and P033). Hobart Brothers has submitted a permit to install and operate application to install seven new solid wire draw benches as part of a new emissions unit P036, two new solid wire draw benches as part of a new emissions unit P037, and a temperature indicating crayon and liquid (referred to as laq) manufacturing process as emissions unit P038.

3. Facility Emissions and Attainment Status:

Miami County is attainment for particulate matter and ozone. After installation of the solid wire draw benches, the potential uncontrolled particulate emissions from the facility are 242 tons per year. After installation of the temperature indicating crayon and laq manufacturing process uncontrolled VOC, individual hazardous air pollutant (HAP) and combined HAPs will be 30.3 tons per year based on an assumption that all of the VOC could be HAP.

4. Source Emissions:

All of the new draw benches to be installed are equipped with fabric filters that have bags with a design outlet concentration 0.01 grain per dry standard cubic foot of exhaust. Based on the design grain loading of the bags and the exhaust flow for each of the new emissions units, annual particulate emissions will be limited to 20.3 tons for emissions unit P036 and 8.26 tons for emissions unit P037 on a rolling 12-month basis.

The combined particulate emissions limitation for the 19 existing draw benches at the facility are limited to 47.3 tons on a rolling 12-month basis. The other particulate emissions sources at Hobart Brothers include welding rod bake ovens, stick welding lab stations, engine test booths, heat treating kilns, and the new temperature indicating crayon manufacturing process amount to potential emissions of 8.1 tons per year. Therefore, this PTI will be issued as a synthetic minor PTI to limit potential particulate emissions to 84.0 tons per year.

Hobart Brother also plans to install a new manufacturing process for temperature indicating crayons and laq that will introduce increase VOC and hazardous air pollutant emissions. The potential VOC emissions from this process have been calculated to be 30.3 tons per year. HAPs are part of the planned solvents that are being used in the manufacturing process. Hobart Brothers has requested a rolling 12-month emissions limitation 9.9 tons for individual HAP and 24.9 tons for combined HAP based on voluntary solvent use limitations.



5. Conclusion:

Hobart Brothers will be issued a federally enforceable PTIO to limit particulate emissions from emissions unit P036 to 20.3 tons on a rolling 12-month basis and emissions unit P037 to 8.26 tons on a rolling 12-month basis. This emissions limitation is based on the use of fabric filters that will limit the concentration of particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust. The synthetic minor particulate emissions limitations will preclude compliance with Title V permitting requirements for major sources.

The federally enforceable PTIO will also include rolling 12-month emissions limitations 9.9 tons for individual HAP and 24.9 tons for combined HAP emissions. The emissions limitations for HAP are all based on a worst case assumption that all of the solvents employed in the temperature indicating crayons and laq manufacturing will evaporate and therefore a rolling 12-month solvent usage restriction is also included in the PTIO. The synthetic minor HAP emissions restrictions will preclude compliance with Title V permitting requirements for major sources.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate emissions	28.6
Individual HAP	9.9
Combined HAPs	24.9
VOC	30.3

PUBLIC NOTICE
9/20/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Hobart Brothers Company I
101 TRADE SQUARE EAST,
TROY, OH 45373

Miami County

FACILITY DESC.: Welding and Soldering Equipment Manufacturing

PERMIT #: P0110493

PERMIT TYPE: Initial Installation

PERMIT DESC: FEPTIO for installation of a new temperature indicating liquid and crayon manufacturing operation and two sets of tubular welding wire draw benches.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Andrew Weisman, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280. Ph: (937)225-4435

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Hobart Brothers Company I**

Facility ID:	0855140007
Permit Number:	P0110493
Permit Type:	Initial Installation
Issued:	9/20/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Hobart Brothers Company I

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Authorization

Facility ID: 0855140007

Application Number(s): A0044579

Permit Number: P0110493

Permit Description: FEPTIO for installation of a new temperature indicating liquid and crayon manufacturing operation and two sets of tubular welding wire draw benches.

Permit Type: Initial Installation

Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/20/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Hobart Brothers Company I
101 TRADE SQUARE EAST
TROY, OH 45373

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110493

Permit Description: FEPTIO for installation of a new temperature indicating liquid and crayon manufacturing operation and two sets of tubular welding wire draw benches.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P038
Company Equipment ID:	Heat Indicating Crayon and Laq Making
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Draw Benches

Emissions Unit ID:	P036
Company Equipment ID:	Solid Wire Draw Benches
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	Draw Benches 224, 225
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Hobart Brothers Company I

Permit Number: P0110493

Facility ID: 0855140007

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. P038, Heat Indicating Crayon and Laq Making

Operations, Property and/or Equipment Description:

Mixing, Drying, Granulation, and Pressing for making of temperature indicating crayons and mixing of materials for the manufacture of temperature indicating lacquers with fabric filter.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3) through d)(6) and e)(4).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 30.3 tons on a rolling 12-month basis. See c)(1).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The individual hazardous air pollutant (HAP) emissions from this emissions unit shall not exceed 9.9 tons on a rolling 12-month basis. The combined HAP emissions from this emissions unit shall not exceed 24.9 tons on a rolling 12-month basis. See c)(2).
c.	OAC rule 3745-114 and ORC 3704.03(F)	See d)(3) through d)(6) and e)(4).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The combined weight of the VOCs employed in the solvents and cleanup materials employed in this emissions unit shall not exceed 30.3 tons on a rolling 12-month basis. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Months	Maximum Allowable Cumulative Emissions of VOC (tons)
1	2.53
1-2	5.06
1-3	7.59
1-4	10.1
1-5	12.6
1-6	15.2
1-7	17.7
1-8	20.2
1-9	22.8
1-10	25.2
1-11	27.8
1-12	30.3

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual usage limitation for VOC shall be based upon a rolling, 12-month summation of the monthly usage rates.

(2) The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this emissions unit shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for the combination of all HAPs, based upon rolling, 12-month summations.

Draft Permit-to-Install and Operate

Hobart Brothers Company I

Permit Number: P0110493

Facility ID: 0855140007

Effective Date: To be entered upon final issuance

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Single HAP Emissions (tons)	Maximum Allowable Cumulative Combined HAP Emissions (tons)
1	2.53	2.53
1-2	5.06	5.06
1-3	7.59	7.59
1-4	9.90	10.1
1-5	9.90	12.6
1-6	9.90	15.2
1-7	9.90	17.7
1-8	9.90	20.2
1-9	9.90	22.8
1-10	9.90	24.9
1-11	9.90	24.9
1-12	9.90	24.9

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for single HAP and combined HAP shall be based upon a rolling, 12-month summation of the single HAP and combined HAP usage each month.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information on a monthly basis for the solvents employed in this emissions unit:
 - a. the identification of each solvent and cleanup material employed in this emissions unit;
 - b. the volume, in gallons, of each solvent and cleanup material employed;
 - c. the VOC content for each solvent and cleanup material employed, in pounds per gallon;

Draft Permit-to-Install and Operate

Hobart Brothers Company I

Permit Number: P0110493

Facility ID: 0855140007

Effective Date: To be entered upon final issuance

- d. the total VOC input from all solvents and cleanup materials employed, i.e., the sum of the products of d)(1)b times d)(1)c for each solvent and clean up material employed; and
- e. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of VOC inputs.

In addition, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

(2) The permittee shall collect and record the following information each month for the entire facility:

- a. the identification of each solvent and cleanup material employed in this emissions unit.
- b. The volume, in gallons of each solvent and cleanup material employed.
- c. The individual hazardous air pollutant (HAP) content for each HAP of each solvent and cleanup material, in pounds of individual HAP per gallon.
- d. The total combined HAPs content of each solvent and cleanup material, in pounds of combined HAPs per gallon, [the sum of all the individual HAP contents from d)(2)c.].
- e. The total individual HAP emissions for each HAP from all solvents and cleanup materials employed, in tons per month [for each HAP, the sum of d)(2)b. times d)(2)c. for each solvent and cleanup material].
- f. The total combined HAPs emissions from all solvents and cleanup materials employed, in tons per month [the sum of d)(2)b. times d)(2)d. for each solvent].
- g. Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all solvents and cleanup materials employed, in tons.
- h. Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all solvents and cleanup materials employed, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative individual HAP emissions and the total combined HAP emissions for each calendar month.

(3) The PTIO application for this emissions unit, P038, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model.

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The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/\text{X} \times 5/\text{Y} = 4 \text{ TLV}/\text{XY} = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: trichloroethylene.

TLV (mg/m³): 269

Maximum Hourly Emission Rate (lbs/hr): 6.41

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m³): 2,319

MAGLC (µg/m³): 6,398

The permittee, has demonstrated that emissions of trichloroethylene, from emissions unit P038, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

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- d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in d):
 - i. all exceedances of the rolling, 12-month emission limitation for VOC emissions for each emissions unit and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - ii. all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - iii. all exceedances of the rolling, 12-month emission limitation for combined HAP and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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- (2) The permittee shall submit annual reports which specify the following information for this emissions unit for each calendar year:
- a. The total volume of solvent employed, in gallons;
 - b. the total VOC emissions, in tons; and

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data for this emissions unit in the annual Synthetic Minor Title V Fee Emission Report.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation:

The VOC emissions from this emissions unit shall not exceed 30.3 tons on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(1).

b. Emissions Limitation:

Individual HAP emissions from this facility shall not exceed 9.9 tons per year on a rolling 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(2) for each individual HAP.

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c. Emissions Limitation:

Combined HAP emissions from this facility shall not exceed 24.9 tons on a rolling, 12-month basis.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(2) for combined HAP.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Draw Benches: P036,P037,

EU ID	Operations, Property and/or Equipment Description
P036	Welding wire draw benches 0, 2, 3,4, 5,6, 7 and 8 with fabric filters (SW1)
P037	Welding wire draw benches 224 and 225 with fabric filter (T8B)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3), and OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	<u>Emissions Unit P036 and P037:</u> The particulate emissions from each emissions unit shall not exceed 0.01 grain per dry standard cubic foot of exhaust. <u>Emissions Unit P036:</u> The particulate emissions from this emissions unit shall not exceed 20.3 tons on a rolling 12-month basis. <u>Emissions Unit P037:</u> The particulate emissions from this emissions unit shall not exceed 8.26 tons on a rolling 12-month basis. See b)(2) a., b)(2)b. and c)(1).
b.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		limitation established pursuant to 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving these emissions units shall not exceed 20 percent opacity as a six-minute average.

(2) Additional Terms and Conditions

- a. Compliance with the requirements of OAC rule 3745-31-05(D) shall be demonstrated by the use of a fabric filter control device, pressure drop monitoring, record keeping, reporting and compliance with the emissions limits in b)(1)a.
- b. The permittee shall implement an operation and maintenance (O&M) plan for this emissions unit and its respective air pollution control system. The O&M plan shall include, but not be limited to, the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of the emissions unit and its respective air pollution control system. The O&M plan shall be submitted to the Regional Air Pollution Control Agency upon request.

c) Operational Restrictions

- (1) The filter media used in the fabric filter shall be designed to limit particulate emissions to less than 0.01 grain/dry standard cubic foot of exhaust.
- (2) The fabric filters that control particulate emissions from emissions each emissions unit shall be configured so that all of the exhaust is vented indoors.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall keep a record of any days when any of these emissions units were in operation and the exhaust from the fabric filters was not vented indoors.
- (2) The permittee shall perform weekly checks, when these emissions units are in operation, for any visible particulate emissions from the fabric filters serving these emissions units. The presence or absence of any visible particulate emissions shall be recorded in an operations log. If visible particulate emissions are observed, the permittee shall also note the following in the operations log:
 - a. the total duration of any visible emission incident; and
 - b. any corrective actions taken to eliminate the visible emissions.

The information above shall be kept separately for each fabric filter serving each emissions unit.

e) Reporting Requirements

(1) The permittee shall submit deviation reports that identify each day when any of the emissions units was in operation and the exhaust from the fabric filter was not vented indoors. Each report shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the deviation occurs.

(2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:

a. all exceedances of the rolling, 12-month emission limitation for particulate emissions for each emissions unit and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

These quarterly reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

(3) The permittee shall submit annual reports which specify the particulate emission rate, in tons, from each emissions unit. These reports shall be submitted by April 15 of each year and shall cover the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Synthetic Minor Title V Fee Emissions Report.

(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:

The particulate emissions from these emissions units shall not exceed 0.01 grain per dry standard cubic foot of exhaust.

Applicable Compliance Method:

Compliance shall be demonstrated based on the design specifications of the filter media used in the fabric filters. If requested, compliance shall be determined by stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures specified in U.S. EPA Reference Method 5 of 40 CFR Part 60, Appendix A.

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b. Emission Limitation:

Emissions Unit P036: The particulate emissions from this emissions unit shall not exceed 20.3 tons on a rolling 12-month basis.

Emissions Unit P037: The particulate emissions from this emissions unit shall not exceed 8.26 tons on a rolling 12-month basis.

Applicable Compliance Method:

The rolling 12-month emission limitations for each emissions unit are based upon the 0.01 grain/dry standard cubic foot of exhaust multiplied by the design flow rate of each fabric filter divided by 7,000 grains/pound and multiplied by 60 minutes/hour. The design air flow rate for each emissions unit and maximum hourly emissions rate are listed in the following table.

Emissions Unit	Flow rate (dscf/minute)	Particulate emissions (lbs/hour)
P036	54,000	4.63
P037	22,000	1.89

The rolling 12-month particulate emissions limitations were developed by multiplying the hourly emissions limit by 8,760 hours/year, divided by 2,000 pounds per ton.

c. Emission Limitation:

Visible particulate emissions from any stack serving these emissions units shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

If requested, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in Reference Method 9 of 40 CFR Part 60, Appendix A..

g) Miscellaneous Requirements

- (1) None.